



State of Utah  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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bcc !

Mary ANN  
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June 21, 2000

Keith Moeller  
Clifton Mining Company  
70 West Canyon Crest Road, Suite D  
Alpine, Utah 84004

Re: Second Permit Review, Cactus Mill, Clifton Mining Company, M/045/049, Tooele County, Utah

Dear Mr. Moeller:

On April 25, 2000 the Division sent our initial review comments to you for the Cactus Mill large mining notice of intention. The review was based on copies of information received from the Bureau of Land Management (BLM). On May 22, 2000 we received your response to our April 25<sup>th</sup> review. After review of your latest comments we still have a number of technical concerns which need further clarification.

It is our opinion that part of the remaining confusion is caused by the lack of a single, comprehensive and cohesive mining and reclamation plan, containing a sufficiently detailed reclamation surety estimate. The plan presently consists of a series of letters addressed to the BLM. These letters have been difficult to review and compare against our regulatory requirements. Please provide the following information:

1. Supporting documentation regarding the bond estimate submitted by Redd Engineering. They have apparently used maps and other information to calculate their reclamation bond, please reference or supply the exact maps or calculations Reed Engineering used to arrive at their figures.

For example, they state that 7.2 acres will be hand broadcast seeded, and hydroseed 0.83 acres. Where is this 0.83 area located? Please provide the supporting documentation which verifies the numbers in your bond. It will require you to go back line by line and reference where this information can be found (i.e., identify the map). We are unable to locate the aerial photo of the site which you stated we might have. We did find a copy of the aerial photo of the Clifton site, but not the mill site. It may help if you order a recent photo from the Department of Agriculture, if necessary.

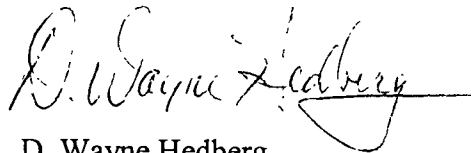
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2. Regarding the questions in our initial April 25<sup>th</sup> review document related to soils, it is apparent that information is lacking to complete this portion of the plan. We do not disagree with your intentions or your ability to conduct reclamation, but it is a requirement that we obtain certain baseline information regarding soils and surrounding vegetation. This involves someone doing a vegetation survey of the surrounding vegetation and obtaining some basic soils data from the soil materials to be stockpiled, amended and used for reclamation. *Please call Lynn Kunzler at (801) 538-5310, if you have any questions regarding the information needed for soils and vegetation.*

We realize this has been a challenging exercise to address two agencies rules. However, if we can finish these last steps we can then move forward with tentative approval of your Large Mine Permit. At that time we will publish the notice of tentative approval in the Salt Lake City and local newspapers, for the required 30-day public comment period. If no adverse comments are received within the 30 days we will then be prepared to issue final approval of the permit application. It will be necessary to post the required reclamation surety before we can issue our final approval, (typically received by the end of the 30-day public comment period).

Please respond to the Division's concerns by **July 21, 2000**. If you cannot meet this deadline or you feel our concerns are not justified, please notify us immediately. We may need to arrange a meeting before our Associate Director to address your concerns. If you have questions or concerns regarding the need of supporting information, please contact Doug Jensen, at 538-5382 or Tom Munson at 538-5321.

Sincerely,



D. Wayne Hedberg  
Permit Supervisor  
Minerals Regulatory Program

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cc: Mike Ford, BLM

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